

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Bureau of Consumer Financial
Protection,

Plaintiff,

v.

Townstone Financial, Inc. and
Barry Sturner,

Defendants.

Case No. 1:20-cv-04176

Judge Franklin U. Valderrama
Magistrate Judge Gabriel A. Fuentes

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS AND
ELECTRONICALLY STORED INFORMATION TO BARRY STURNER**

The Bureau of Consumer Financial Protection (Bureau) requests that Barry Sturner produce the following documents and electronically stored information, as required under Federal Rule of Civil Procedure 34.

INSTRUCTIONS

1. Responsive Documents are to be produced in accordance with the attached Discovery Requests Document Submission Standards, except where such Standards would not allow for production in a reasonably usable form as required under Federal Rule of Civil Procedure 34(a)(1)(A). Please contact counsel of record for the Bureau with any questions or concerns you have about the form of production for any responsive Documents.

2. All productions sent by U.S. Mail, FedEx, UPS, or other courier must be addressed to:

Consumer Financial Protection Bureau



You may produce documents electronically using the Bureau's extranet. The procedures for extranet production are described in the attached extranet guide. To facilitate transmission of any Documents, contact the undersigned counsel for the Bureau.

3. Unless otherwise noted, the relevant period for which the production of Documents requested is January 1, 2011 to the present, including all Documents created, sent, received, applicable, or in effect during this period, unless otherwise specified.

DEFINITIONS

For purposes of these Requests:

1. "Communication" means any discussion, disclosure, transfer, dissemination, or exchange of information or opinion, in any manner and whether formal or informal or direct or indirect.

2. "Document" shall be defined broadly to include all items encompassed by Federal Rule of Civil Procedure 34(a)(1)(A).

3. "Townstone" means "Townstone Financial, Inc." and any other name by which it has been known; and its predecessor and successor entities, affiliates, parents, and subsidiaries, and any and all of their principals, directors, officers, employees, agents, representatives, consultants, attorneys, accountants, independent contractors, and other persons working for them or on their behalf.

4. "Person" means an individual, partnership, company, corporation, association (incorporated or unincorporated), trust, estate, cooperative organization, or other entity.

5. "You" means defendant Barry Sturner.

**REQUESTS FOR PRODUCTION OF DOCUMENTS
AND ELECTRONICALLY STORED INFORMATION**

1. Produce all Documents, including all emails, chats, and text messages, referencing any ethnic, gender, religious, racial, or group-based slur or making any generalization, differentiation, or stereotyping, or referring to any generalization, differentiation, or stereotyping, based on race, color, religion, national origin, sex, marital status, or age.
2. All Documents referring to Mexicans or Canadians.
3. Produce all Communications, including emails, chats, social-media posts, and text messages, referring to characteristics of any geographic areas or neighborhoods.
4. For the period beginning on July 1, 2018, produce all account statements, including any bank-account statements or credit-card statements, showing money received from Townstone, how any money received from Townstone was used, and where any money received from Townstone is currently stored.
5. All Documents, including but not limited to account statements, relating to Your payment of any Townstone expenses or relating to any transfer of funds between Townstone and You since July 1, 2018, including but not limited to Documents relating to the reasons for the payment or transfer and the uses of the transferred funds.
6. For all accounts and periods identified in the interrogatories served upon You by the Bureau contemporaneously with these requests, produce all account statements.
7. Produce all financial statements showing Your net worth at any point since July 1, 2018.
8. Produce all written or recorded statements relating to the Bureau's allegations or any of Your claims or defenses.

Respectfully,

/s/ Jacob A. Schunk

JACOB A. SCHUNK (IA AT001908)

Email: jacob.schunk@cfpb.gov

Telephone: (202) 718-0394

BARRY E. REIFERSON, NY Reg. #24343893

Email: barry.reiferson@cfpb.gov

MARY OLSON (IL ARDC #6297334)

Email: mary.olson@cfpb.gov

230 S. Dearborn St., Suite 1590
Chicago, IL 60604

and

1700 G Street, NW
Washington, DC 20552

Attorneys for the Bureau of Consumer Financial Protection